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Date: October 15, 2005 9:29:07 AM PDT
To: "Michael DeLapa D." <mdelapa@mdelapa.com>, ccrsqcomments@resources.ca.gov
Subject: gap analysis

Mike:

Being the paranoid sort, I have sent these 11th hour comments to you directly as well as to the "ccrsqcomments" address.? Thanks for all your hard work and see you soon.

Eric

TO: MIKE DELAPA

FROM: ERIC ENDERSBY

DATE: 13 OCT 05

RE: GAP ANALYSIS COMMENTS

I would like to submit the following comments to fill in some of the gaps in the current gap analysis of existing MPAs, de-facto MPAs, and existing management measures.

Regarding the Monterey Bay National Marine Sanctuary, Rockfish Conservation Area (RCA), Essential Fish Habitat (EFH) areas, and the seasonal Rockfish Conservation Zones, I defer to the comments provided by Steve Scheiblaue. His reasonings and methodology in evaluating these areas in the "north" zone (north of Pt. Sur) apply equally to the south. Therefore I will not repeat them, only "second" them.

In making comments, I will only offer them where, in my opinion, I am filling a gap. If a design consideration or objective is not met in my opinion, I will list nothing. Regarding the south, I offer the following:

Diablo Canyon Nuclear Powerplant Exclusion Zone

First, an argument can be made that this area is an altered ecosystem because of the powerplant influence, and that the intake of seawater for cooling is a "take" of larvae and some fishes that get caught in the intake screening. However, I strongly feel that these impacts, while real and significant, will be offset by mitigation measures that are in the formative stages right now, and once completed will serve to the degree necessary to nullify the arguments against this area as being a good candidate for an MPA.

Design Considerations

1. Negative socio-economic impacts minimized because the area is off-limits anyhow.
3. Fishing effort shift has already occurred.
4. Many of the species identified in the NFMP are present in this area, including all of the shallow and medium-depth rockfishes, lingcod, cabezon, and bocaccio. In addition, both red and black abalone are found in this area. Therefore this area meets this design consideration well.
7. This area is sited where a long-standing biological monitoring program has been in place, the PG&E Marine Lab. In addition, the security force for this area is well established, both from land and sea, to prevent intrusion. Therefore this design consideration is well met.
9. This site has been studied biologically very closely for several decades, therefore this design consideration is well met.
10. The center of this area, the powerplant itself, is easily recognized. In addition, the boundary of this area (a 1-mile radius around the plant) is relatively easy to determine, especially with either radar or a GPS, which almost all boats have at least one of. Therefore this design consideration is well met.

Objectives (for example Goal 1, Objective 5 will be listed as “G1O5”)

- G1O1. Area has rocky, sandy, and kelp forest areas in a range of depths from shore to 25 or so fathoms, so high species diversity is present. Objective met.
- G1O2. Several habitat types are present within the 1-mile radius, therefore objective is met.
- G1O3. Several key species present, therefore objective is met.
- G1O4. Area is no-entry, therefore everything is totally protected from take except for the powerplant intake. This concern was addressed above, and therefore this objective will be met.
- G1O5. Same comments as for the previous objective.
- G2O1. This area protects habitat and ecosystems of sea otters, abalone, and some bottom fish identified as rare, threatened, endangered, depleted, or overfished. Therefore this objective is met.
- G2O2. Again, while larval sources are not protected in this area, this impact will be met by the mitigation measures that will be in place. However, large, mature individuals will be protected in this area, so this objective is met.
- G3O1. Area is accessible for educational and study opportunities with the presence of the PG&E marine lab on-site. Objective met to a degree.
- G3O2. This area is a complete no-take area, which makes it a replicate of the current Vandenberg and Big Creek Reserves. In addition, it has habitat types similar as those in the other reserves, therefore meets this objective.
- G3O3. With presence on long-standing PG&E marine lab, this objective is met in terms of having scientific monitoring and research projects in place.
- G3O4. Natural size and age structure totally protected within this area, however not sure how either consumptive or non-consumptive recreational experience is enhanced since this area is no-entry.
- G4O1. This area has some small pinnacles, therefore objective somewhat met.
- G4O2. Habitat included in this area are hard and soft bottoms from 0 to 25 fathoms, seagrass beds, kelp (macro and nereoid) beds, and possibly some larval retention area due to down-coast nature of site. Since these habitats are largely in the current Vandenberg and Big Creek reserves, this objective is largely met.
- G5O1. Since this area has a long-term biological monitoring plan and protocol in place, this objective has a head start in this regard.
- G5O2. Since this area is between Vandenberg and Big Creek, it helps fill the SAT guideline reserve gap in this area zone.

Vandenberg Safety Zone 4

Design Considerations

1. Since designation of this area as an MPA would simply make it's de-facto MPA status (no-take in terms of not being able to stop and fish, so it's a Conservation Area) official, there would be little negative socio-economic impacts, especially if shore fishing were allowed to account for base personnel who do fish from shore (though these impacts are negligible, as is evident in the State's current "shore fishing allowed" exemption during rockcod closures). May have some negative socio-econ impacts to the Vandenberg Aqualeers Dive Club members.
2. Area recognizes a federally restricted area, although not a fishery management area, it acts as one.

3. Significant fishing effort shifts should not occur since no realized fishery management changes will occur. Objective is met.
4. Many of the 19 species in the NFMP, and their habitats, are present in this area, as are at least black abalone, and probably red abalone as well.
7. Since this area is enforced by Vandenberg "Frontier Control," excellent enforcement is already in place.
10. This area is a long-standing safety zone, with well-published and recognizable boundaries to most users familiar with the area, so this objective is met.

Objectives

- G1O1. Area has relative high species diversity, especially in soft-bottomed areas.
- G1O2. Area has diverse habitats from rocky reefs in shallow to moderate depths, sandy bottom in all depths to 3 miles from shore, riverine confluence with a steelhead river, and relatively close to Arguello Canyon offshore. Therefore objective is somewhat met.
- G1O3. Natural size and age structure of rockfish and other bottom fish greatly protected in all habitats. Objective is met.
- G1O4. Since the area is essentially no-take, except for "moving" types of fishing such as trolling and crabbing, natural trophic structure and food webs largely protected. Therefore objective is largely met.
- G1O5. Same reasoning as for previous objective applies here.
- G2O1. This area protects sea otters, abalone, and some bottom fish listed as rare, threatened, endangered, depleted, or overfished, and the habitats and ecosystems upon which they rely. Therefore objective is largely met.
- G2O2. Larval sources (large, mature individuals) greatly protected. Therefore objective is met.
- G2O3. Migratory and highly mobile species harvest is allowed to the extent that trolling and crabbing allows, therefore objective is met.
- G3O2. Area is a replicate of other conservation areas with rocky and soft bottoms, as well as reserves with similar habitats. Therefore objective is met.
- G3O4. Natural size and age structure of most species ensured, therefore objective is greatly met.
- G4O1. Area is close to a major submarine canyon (Arguello), and near theoretical larval retention areas of Pt. Arguello and Purisma Pt. Therefore objective is somewhat met.
- G4O2. Area includes several habitat types across a moderately broad range of depths. Therefore objective is somewhat met.
- G5O2. This area fits many of the MPF scientific guidelines including size (it's large) and spacing (it's adjacent to an existing reserve, relatively near MPAs of the channel islands and the de-facto MPA at Diablo).

Thank you very much for considering my analysis, and I hope that this help to fill in some of the gaps.

Faithfully,

Eric Endersby